

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSE MARIA DeCASTRO,
a/k/a CHILLE DeCASTRO,
a/k/a DELETE LAWZ,

Plaintiff,

v.

JOSHUA ABRAMS a/k/a
ACCOUNTABILITY FOR ALL, KATE
PETER a/k/a MASSHOLE
TROLL MAFIA,

Defendants.

CASE NO. 1:22-cv-11421-ADB

AFFIDAVIT OF KATE PETER

I, Kate Peter a/k/a Mass Hole Troll Mafia, under oath depose and state as follows based upon my personal knowledge:

1. I am one of the Defendants in the above-captioned matter. I am employed full-time as a residential property manager and have been for 6 years. I live at home with my two children, aged 16 and 13. I am their full-time caregiver and sole provider. In my spare time, I also run a YouTube channel, presently called “Masshole Troll Mafia.”

2. I first learned of Plaintiff, Jose DeCastro, in or around April 2022 from one of my YouTube followers. Mr. DeCastro runs a YouTube channel called “Delete Lawz” that is vehemently anti-government and anti-police. Around April 2022, I began to research Mr. DeCastro’s background and post videos about him.

3. On April 28, 2022, the first time Mr. DeCastro ever contacted me,¹ he sent what

¹ At this point in time, I had never directly spoken to Mr. DeCastro through any medium.

appeared to be a “cease and desist” letter via a third party, Joshua Abrams, also a Defendant in the above-captioned matter. Mr. Abrams stated in these communications that he did so at Mr. DeCastro’s direct instruction. Mr. Abrams provided me with a “screenshot” showing Mr. DeCastro instructing Mr. Abrams to send me the message.² The message conveyed by Mr. DeCastro was vulgar, insulting, and threatening, and included what I understood as a threat of physical violence. It said, among other things: “.... You’re damn lucky we have a legal system, and I’m a man of law [sic] order, or I would let you know when I was coming... So I could see the look of tear [sic] on your face as closed it.” In this message, Mr. DeCastro also stated clearly what I believe to be his true intent pursuing litigation against me, plainly: “I will check your social media channels for the retraction... If it is not complete and full... You’ll be served a lawsuit next week. I don’t care if I win... I care that you have to hire a lawyer... I care that I extend the process for as long as I can to drain you.” Attached hereto as **Exhibit A** is a true and correct copy of the “cease and desist” letter.

4. On May 24, 2022, Mr. DeCastro openly threatened me during a public YouTube broadcast, saying: “honey, I know where you live. You’re damn lucky, you’re lucky, you’re lucky I’m not my father, if I was my father, honey, if I was my father. . . . You’re lucky, you’re lucky, you are a lucky person that I have morals and ethics and standards. You - you - you, you treat me that way, you’re damn lucky that I’ve sworn to law and order and to peace and to non-violence, I know where you live, I know I know where your door is. I don’t play that route I play legal route, I play the court route, that’s the game I play, so you don’t have to worry about anything for me, but just be careful what you do lady. The, the lady at the Masshole Report, be careful what you do. There’s people who are not like me, you defame the wrong person, honey,

² Filed simultaneously herewith is the Affidavit of Joshua Abrams attesting to his sending of the “cease and desist” letter on Mr. DeCastro’s behalf.

everybody knows where you live. So, but don't worry, it won't be me. I'm going to sue your ass though."³

5. On May 28, 2022, Mr. DeCastro stated during a public YouTube broadcast that he had located my address and was planning to personally serve me with a lawsuit. In particular, Mr. DeCastro stated: "So he already did the heavy lifting yesterday and today and now we just got to find the proper address. We found Kate's address, we found hers, we're gonna serve her this weekend."⁴

6. Given the prior thinly veiled threats of physical violence Mr. DeCastro had made against me, both in his purported "cease and desist" communications and statements made during his numerous other lengthy YouTube broadcasts, coupled with the lack of a legitimate filing that I could locate on PACER, I was alarmed to say the least. I spent the majority of the weekend standing "watch" on my front porch so that if Mr. DeCastro did arrive and a confrontation arose, I could ensure that it occurred away from my family/minor children.

7. On May 30, 2022, amidst Mr. DeCastro's threats of showing up at my residence, I observed Mr. DeCastro conducting a live YouTube broadcast in Stoneham, MA. During this broadcast, Mr. DeCastro repeatedly approached children as young as 6-9 years old and loudly advised them not to trust the police, that the police would "rape them," "torture them," and "put them in cages." I confronted Mr. DeCastro in person during this live broadcast. Mr. DeCastro is observed on film assaulting me several times - shoving me, pushing me, and purposefully walking backward into me. At one point he elbowed me with such force that my cell phone can

³ This YouTube broadcast can be viewed at <https://youtu.be/lss2-2VzRKg?t=5216>. All but one of the YouTube links provided in this Affidavit jumps directly to the point in the video, or shortly before, the quoted language begins. In any event, for the convenience of the Court, I've also included timestamps of where that quoted language begins. The quoted language in this video begins at 1:26:59.

⁴ This YouTube broadcast can be viewed at https://youtu.be/I_j0lIn7pXk?t=2101. The quoted language begins at 35:03.

be seen being knocked out of my hand. During this incident, Mr. DeCastro explicitly threatened to knock me out, put me on the ground, etc. numerous times. He is observed on film approaching police officers and asking for permission to physically assault and/or pepper spray me as well.⁵

8. Mr. DeCastro has attempted to take out baseless harassment protection orders against me on two separate occasions, trying essentially the same facts, once in Woburn District Court, and once in Attleboro District Court. He has explicitly stated on many occasions that his intent was to punish me, and “burn me off the internet.” On both occasions, the Courts determined Mr. DeCastro was not being harassed.

9. On June 12, 2022, Mr. DeCastro called the Police Department in the city next to my home while he was out of state. While arguing with the officer about the proper procedure for filing a report with Attleboro Police (in person), Mr. DeCastro requested permission from the officer to go to my home and “handle this himself,” which I interpreted as yet another implicit threat. Mr. DeCastro uploaded this phone interaction with Attleboro Police onto his YouTube channel. He specifically stated: “Listen if you give me permission, I’ll handle this on my own. Let me just do, what, let me do what I want to do, I’ll just go handle it, how about that? How about that, I’ll head over to this person’s house, and I’ll just take care of this. Does that sound fair?”⁶

10. On September 3, 2022, Mr. DeCastro and an associate, “Zane Kane,” arrived at an unrelated court event to which neither was a party in Roxbury District court to confront me. In

⁵ The May 30, 2022 incident is captured at <https://youtu.be/ZKNl9EcQzkA>.

⁶ This YouTube broadcast can be viewed at https://youtu.be/T8WpW_tav4s?t=1337. The quoted language begins at 22:17.

the middle of open court, and in the presence of court officers and my attorney at the time, Elyse Hershon, Mr. DeCastro leaned down into my face while I was seated and said, “This is just the beginning. You have no idea what’s coming for you. You have no idea. I am going to destroy you.” Mr. Kane then attempted to “serve” me by disrupting court and throwing a manila folder into my lap, yelling “You’ve been served!” Mr. DeCastro and Mr. Kane were escorted out of the courtroom by court officers and later readmitted a total of four times during open court. At one point they both approached the bench where I was standing with my attorney in the middle of the matter being heard. They then proceeded to wait outside the courthouse for at least 20 minutes until I exited the building with my attorney. Mr. DeCastro and Mr. Zane then proceeded to follow me to my car, physically menacing me, insulting me, and attempting to intimidate me. Part of this was captured on film by Attorney Hershon.⁷ Mr. DeCastro punched the trunk of my vehicle as I attempted to drive away, then circled back to find Attorney Hershon still outside conversing with another attorney. Mr. DeCastro then proceeded to berate Ms. Hershon, calling her a “whore” and a “loser,” and demanding to know what her life’s mission and purpose are. From speaking to Attorney Hershon after the fact, she was extremely rattled by this interaction. This entire ordeal does not appear to have been a good faith effort to serve me, as Mr. DeCastro essentially attempted service himself, later hiring a constable to serve me at my home address anyway.

11. Shortly after filing this lawsuit, Mr. DeCastro’s harassment intensified. He began speaking on a “three-pronged plan” intended to “obliterate” me, and has made repeated statements echoing and re-affirming this intent, a sampling on which include, without limitation:

⁷ A true and correct copy of a USB drive containing this video, a true and correct copy of which is **Exhibit B** to this Affidavit, is being hand delivered to the Court forthwith.

- a. On September 4, 2022, Mr. DeCastro stated: “So I’ll let you guys know what happens on Tuesday, but there’s - this is only one part of the plan. You guys remember the other day I put up a video of David Goggins, and he said when you start to attack you keep attacking until your enemy is obliterated. So this is only one prong of the attack, there’s two more prongs against Kate and Josh [Abrams] and everybody else I’m suing, but Kate and Josh the second prong comes on Tuesday, the third prong comes after that. I’m going to attack and attack and attack until I take them down. So you got my attention, you wanted it you got it, so that’s where it is that’s where it is.”⁸
- b. On September 6, 2022, Mr. DeCastro stated: “As we continue down the line, I can’t say much else, but we have a couple surprises for them. I told you it’s a three-prong attack so there’s two more prongs to go tomorrow the second prong drops, and then after that there’ll be a third prong, and I’m not gonna stop until I take these people down. And not just the people here, there’s people all over the country who I’m going to take down, because you just- I just can’t allow this. I just can’t allow this, you know.”⁹
- c. On September 7, 2022, Mr. DeCastro stated: “Eventually I’m gonna get them, because the thing is that, I’ll, I will break them financially. They will have to hire a lawyer. I will file motion after motion after and I’ll just keep going legally after

⁸ This YouTube broadcast can be viewed at <https://youtu.be/-jww8CR3-7c?t=5792>. The quoted language begins at 1:36:32.

⁹ This YouTube broadcast can be viewed at https://youtu.be/_x-ZvFDp2Cs?t=4958. The quoted language begins at 1:22:38.

them until I break them, until they can't afford to hire a lawyer anymore so they run out of money. That's what I'm gonna do, I'm gonna break them.”¹⁰

d. On September 8, 2022, Mr. DeCastro stated, without limitation:

- i. “...every t-shirt she sells, every piece of merch she sells I will take every last dime, and if not through federal through state court in California, I'm not done I, I - you have woken me up and I'm taking your money, it's a fact. You can't make defaming merchandise about another person using their likeness, that's not, that's not how it works. That's not how it works, I'll be in LA soon, so I'm going to Los Angeles I may even go up to Sacramento to file, but I'm going to go to LA, I may file in LA Superior Court too, so I'm not sure yet.”¹¹
- ii. “... so any which way, listen, so uh, next step guys I'm – I'm – I'm, the third prong California, I'm gonna sue 'em again. So this isn't over, this isn't over until I take that chick's channel down.”¹²
- iii. “They've never dealt with an animal like me, they never have. To be honest, they probably never will because I'm going to get them taken off of social media. That's my goal, I don't care about getting their money. Now, my partner wants to take their money out of their pocket but I

¹⁰ This YouTube broadcast can be viewed at <https://youtu.be/XX-is5kJ6zQ?t=722>. The quoted language begins at 12:03.

¹¹ This YouTube broadcast can be viewed at <https://youtu.be/SDia0Vl-8fU?t=2291>. The quoted language begins at 38:11.

¹² This YouTube broadcast can be viewed at <https://youtu.be/SDia0Vl-8fU?t=2515>. The quoted language begins at 41:50.

don't care. I- I literally want to - I want to get their channels taken down and I - I can't wait to do it. It just takes a long time, the wheels of justice spin slowly, but they - they are crushing as they come around, and so I mean, anybody who's ever dealt with the legal system knows that when all of a sudden you have to do these horrific hoops you have to jump through . . . well these folks are about to meet some horrific hoops. It's because it'll never stop either. I'll just keep on hammering them, the third prong hasn't even dropped yet. When the third prong drops that's when they're like damn this guy won't stop. Nope I'm not stopping. I'm not stopping, I'm taking you off social media, that's my goal that's what I'm gonna do."¹³

- iv. "Because here's the thing, I will never stop now. I will never stop because, I'm - I'm not only going to sue that trick ass hoe for me. I'm gonna sue her, I'm gonna help other people sue her is what I'm gonna do and then she's gonna be just overwhelmed. I'm gonna help anybody else got harassed by Kate, contact me and I'll help you sue her. So I'm going after this bitch until she is gone, and I'm not gonna stop coming. You know, and she can have all these cop suckers and all these cops whoever they're like, 'oh we're gonna help her'. . . you won't be able to help her, it won't, you won't be able to help her for long."¹⁴

¹³ This YouTube broadcast can be viewed at <https://youtu.be/IEcwCav3wS8?t=5431>. The quoted language begins at 1:30:34.

¹⁴ This YouTube broadcast can be viewed at <https://youtu.be/IEcwCav3wS8?t=5605>. The quoted language begins at 1:33:25.

- e. On September 15, 2022, Mr. DeCastro stated, without limitation:
- i. “Don’t lie, that’s what you support. You don’t support Kate Peter and the troglodyte that she is, I got a video of her coming out, I’m not going to release it until after I get my harassment protection order revealed, and then if she talks about me, I’ll file criminal charges. Because she’s going to lose on September 21st, it doesn’t matter how much your lawyer costs, she’s going to have zero chance of winning, absolutely zero. You - you don’t understand what I’ve put together. You can love her all you want, she won’t be able to talk about me after September 21st, I’m willing to, I’m willing to bet on that.”¹⁵
 - ii. “I’ll just – I’ll level with you guys. You know, um, I warned this person that if they decided to tangle with me, that I would get their account deleted from YouTube, that I would get their discord account deleted, and so now that’s what I’m doing. Eight different parties are coming on September 21st, Kate. I’ll be the only person on zoom. Seven other parties are appearing in person. Against you, Kate.”¹⁶
 - iii. “She whores herself out as the host of hatred, that’s not a sexual thing at all, I just want to be clear on that. I’m not saying she’s a prostitute I’m saying she’s an absolute media whore. It’s a very normal term, so I just want to be clear about that you know I want to be because I do know the laws of defamation very well and I think Kate is a media whore and you

¹⁵ This YouTube broadcast can be viewed at https://youtu.be/6h-H_AMscBY?t=550. The quoted language begins at 9:11.

¹⁶ This YouTube broadcast can be viewed at https://youtu.be/6h-H_AMscBY?t=946. The quoted language begins at 15:46.

people who have funded her is disgusting to me I hope you burn in hell. I hope you burn in hell, and I hope your kids get bone cancer. I think you're horrible, you're horrible people you're just disgusting there's no other way to see it. You know, you're, you're bad people, you back up someone who's a bad person, a genuinely bad person so I wish you the worst that's all. That's all. That's all. Ha ha ha. I wish you the absolute worst. I hope you burn in hell, I hope your family does. I have no respect for any of you, you guys who gave this chick money. Just disgusting, just disgusting, just ugh, like you gave someone money who literally lost her children because of her substance abuse problem. Her kids were adopted out by somebody else and you sent her money, you sent her money. Ugh. I don't really care if you gave Kate money, I hope you get bone cancer. I think you're scum, you are scum of the earth, you supported that chick you're scum, you're scum, you're a scummy person."¹⁷

iv. "...The gloves are off, bitch. Burn in hell. The end."¹⁸

12. After learning I had retained counsel, Mr. DeCastro began sending a series of bizarre, menacing, and insulting email communications directed at both myself and my attorney. Mr. DeCastro sent every single email to me, as well as my attorney, despite my attorney's request that Mr. DeCastro refrain from his abusive and insulting contact. I have not answered any of these emails.

¹⁷ This YouTube broadcast can be viewed at https://youtu.be/6h-H_AMscBY?t=5083. The quoted language begins at 1:24:43.

¹⁸ This YouTube broadcast can be viewed at https://youtu.be/6h-H_AMscBY?t=5200. The quoted language begins at 1:26:40.

13. In one such email from October 11, 2022, after my attorney requested that Mr. DeCastro communicate directly with him on my behalf, Mr. DeCastro reiterated that the litigation against me was purely intended to harass and intimidate. He specifically stated: “You can shove your cease-and-desist up your ass . . . Kate – I’m never going to stop until you’re done. I will never ever ever ever ever stop . . . And it’s not just me.” A true and correct copy of this email correspondence is attached hereto as Exhibit C.

14. On October 14, 2022, Mr. DeCastro yet again broadcast himself making threats and echoing his intent to use the legal system purely for harassment and vengeance. In particular, Mr. DeCastro stated: “Bombshell drops tonight for the person I’m sending the email to tonight, tonight the bombshell drops for the person who I’m emailing. Tonight. That happens tonight, they’re going to lose their mind, they’re going to lose their mind because their whole way of life is going to be upended, because they put themselves in a very, very bad position. They put themselves in a horrible position, and I caught them so now that I’ve got them, now it’s just, do I want to hurt you, uh, through the legal system, do I want to make you pay through the legal system? Is that what I want to do?”¹⁹

15. On October 17, 2022, Mr. DeCastro sent me an email with a settlement demand. I did not respond. Shortly thereafter, Mr. DeCastro yet again broadcast himself on YouTube, stating: “I gave, um, the Troll Mafia a settlement offer today that was very simple - fifty thousand dollars, remove every video make a full apology, and if, and that - the offer was only good today, tomorrow the offer doubles. I’m gonna, I’m gonna punish people who decide to do things that disparage other people, and there’s - a – I’ll, I’ll probably take most of the money that

¹⁹ This YouTube broadcast can be viewed at <https://youtu.be/NkLcPTnehho?t=435>. The quoted language begins at 7:09.

I'm gonna get, and I'll - and I will just continue to hammer her. I'm not going to tolerate these things, so I'm not going to tolerate it."²⁰

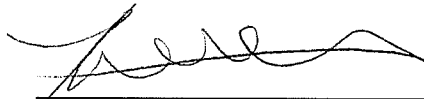
16. Mr. DeCastro has suggested that I use the "Wickr" application to send messages to third parties. I have never used "Wickr" nor was I aware of its existence until Mr. DeCastro said, incorrectly, that I both know of and use it to message others.

17. Mr. DeCastro's conduct has been extremely concerning and anxiety-provoking. Over the course of several months, he has made it explicitly clear that he wishes me physical harm, intends to use the court process to impart the maximum amount of emotional and financial damage on me that he can muster, and will stop at nothing until he feels he has sufficiently "destroyed" me. I consider myself to have quite "thick skin," so to speak, as a controversial, outspoken, abrasive female online figure, I am no stranger to contentious and incendiary language and certainly have a deep abiding respect for the First Amendment and all the expression, however offensive, that it allows for. However, I have never in my life experienced such an unrelenting barrage of threats, harassment, and malicious court action. This has been extremely stressful for me, and by extension, for my family. I am consistently anxious and unsure of the lengths to which Mr. DeCastro will go to exact the revenge he so adamantly feels he is entitled.

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²⁰ This YouTube broadcast can be viewed at <https://youtu.be/TlSkezWtPmQ?t=2007>. The quoted language begins at 33:27.

Signed under the penalties of perjury on this 20 day of October 2022.

A handwritten signature in black ink, appearing to read 'Kate Peter', written over a horizontal line.

Kate Peter